

THE HONORABLE MARSHA J PECHMAN

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JUL 15 2002 PM

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON DEPUTY

BY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MERCHANTS CREDIT CORPORATION,

Plaintiff,

v.

JAMES F. WALKER AND ELLIE
WALKER,

Defendant

No 02-998P

THIRD PARTY DEFENDANT'S
INITIAL DISCLOSURES

CV 02-00998 #00000007

Third-party defendant, pursuant to Federal Rule of Civil Procedure 26(a), and this Court's order, states as follows.

A. Witnesses Pursuant to F.R.Civ.P. 26(a)(1)(A).

As the third-party plaintiff's claims are preempted by ERISA, the evidence should be limited to the ERISA administrative record. Persons with knowledge of the documents and communications with the third party plaintiff's attorney include

Katrina M Brohman
C/o Bullivant Houser Bailey
2400 Westlake Office Tower
1601 Fifth Avenue, Seattle, WA 98101

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1 B.

2 1 Puget Sound Freight Lines Employee Benefit Plan Previously produced and filed
3 with removal documents

4 2 State court records Previously produced and filed with removal documents

5 3. Selected business records of Great-West Life and Annuity Insurance Company.

6 Will be supplemented

7 C. Damages

8 N/A

9 D. Insurance

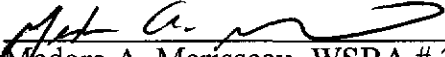
10 N/A

11 E. 26(a)(2) Experts

12 Third-party defendant has not yet identified expert witnesses in this matter. Third-
13 party defendant reserves the right to identify additional experts at a later date

14 DATED this 15th day of July, 2002

15 BULLIVANT HOUSER BAILEY PC

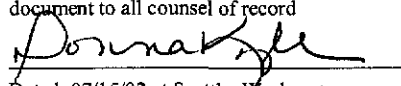
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17 By 
18 Medora A. Marisseau, WSBA # 23114
19 Heidi M. Eckel, WSBA #31596

20 Attorneys for Third Party Defendant
21 Great-West Life & Annuity Insurance Co

22 3302475 1

23 **CERTIFICATE OF SERVICE**

24 I certify under penalty of perjury under the laws of the
25 State of Washington that on this day I caused to be
26 delivered via facsimile and mail a copy of this
document to all counsel of record


Dated 07/15/02 at Seattle, Washington